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7 Attorneys for Plaintiff

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 Bernhard Kühmstedt, an individual,
12 Plaintiff,

13 v.

14
15 Gramercy Global Entertainment, LLC,
16 d/b/a "theblast.com", a Delaware limited
17 liability company; and DOES 1-10,
18 inclusive,

19 Defendants.
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Case No.: 2:22-cv-04981-SB-MRW

**SECOND STIPULATION TO
EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT**

Complaint Served: July 26, 2022


Initial Response Date: August 16, 2022

New Response Date: Sept. 15, 2022

Pursuant to Central District of California Local Rule 8-3, plaintiff BERNARD KUHLMSTEDT ("Plaintiff") and defendant Gramercy Global Entertainment, LLC ("Defendant") through their respective counsel, jointly stipulate to extend the time for Defendant to respond to Plaintiff's initial complaint for a period of (30) days, such that Defendants' deadline to respond to the Complaint shall be extended from August 16, 2022, up to and including September 15, 2022. There have not been any previous requests to extend Defendant's deadline to respond to the Complaint.

IT IS SO STIPULATED.

Dated: August 16, 2022 By: /s/ Frank R. Trechsel
Scott Alan Burroughs, Esq.
Frank R. Trechsel Esq.
DONIGER/BURROUGHS
Attorneys for Plaintiff

Dated: August 16, 2022 By: /s/ John Ankwitz
Gramercy Global ENT, LLC
COO
 8.16.22

Pursuant to Central District of California Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all of the signatories listed above, and on whose behalf this Stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: August 16, 2022 By: /s/ Frank R. Trechsel
Scott Alan Burroughs, Esq.
Frank R. Trechsel Esq.
DONIGER/BURROUGHS
Attorneys for Plaintiff